

EXHIBIT A
TO
NOTICE OF REMOVAL

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Attorney for Plaintiffs

ROCCO CREEL, ADVOCATES FOR
DISABLED AMERICANS.

Plaintiffs,

vs.

UNITED ARTISTS and or REGAL
ENTERTAINMENT Defendants.

SUPERIOR COURT OF NEW JERSEY
CAMDEN COUNTY

LAW DIVISION

Civil Action No. CAM-L-

COMPLAINT

2961-16

Plaintiff Rocco Creel 16 Ivy Hall Lane Sicklerville Camden County New Jersey,
Plaintiff Advocates for Disabled Americans, doing business in Cherry Hill, Camden
County New Jersey, by way of complaint against Defendant states:

FIRST COUNT

1. Plaintiff Creel is disabled and uses a wheelchair. Plaintiff resides in Gloucester County, New Jersey.
 2. Plaintiff Advocates for Disabled Americans (AFDA) is a civil rights organization, whose goal in part is to enforce the civil rights of the disabled with an office in Camden County.
 3. Defendant corporation is located at 7132 REGAL LN KNOXVILLE, TN 37918.
- Defendants do not maintain a legal status in New Jersey. The property in question which is the subject matter of this suit is located 121 Tuckahoe Rd. Sewell, New Jersey 08080.

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4. On many occasions including December 18, 2015. Plaintiff Creel has been a patron of Defendants' movie theater but his ability to use same was impaired because of the lack of access to him and the disabled as a whole. Indeed on December 18 2015 he fell due to the lack of access.

Specifically, (1) there are no proper parking spaces for the disabled (2) no proper accessible routes; and (3) no accessible bathrooms.

6. The above violations are not exclusive. Plaintiff reserves the right to amend the allegations as discovery progresses.

7. Plaintiff intends to return to said public accommodation to be a patron.

8. Plaintiff also intends to return as a tester.

9. As a result Plaintiff sustained distress and anger.

10. The lack of access is a violation of New Jersey Law Against Discrimination (LAD) and the federal Americans with Disabilities Act (ADA).

11. Wherefore, Plaintiff Creel demands judgment for :

- a. Injunctive relief and damages under the LAD.
- b. Attorney fees.
- c. Costs of suit.

SECOND COUNT

12. Plaintiff AFDA repeats the allegations of the first count.

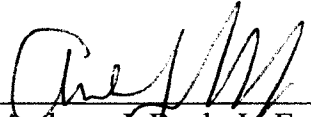
13. Plaintiff Advocates for Disabled Americans with offices in Cherry Hill,

Camden County New Jersey and its members have suffered and will continue to suffer direct and indirect injury as a result of this discrimination.

14. Wherefore, Plaintiff Advocates for Disabled Americans demands judgment for:

- a. Injunctive relief.
- b. Damages under the LAD
- c. Attorney fees.
- d. Costs of suit.

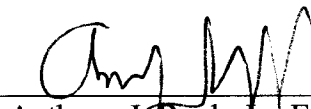
Date: August 5, 2016.


Anthony J. Brady Jr. Esq.

CERTIFICATION

I further certify pursuant to R 4.5-1, that this matter in controversy is not the subject of any court of a pending arbitration proceeding nor any other action or arbitration proceeding contemplated. Further, the Plaintiffs are not aware of any other parties that should be joined in this matter.

Date: August 5, 2016.


Anthony J. Brady Jr. Esq.